From: "Henry Austin" <haustin@osmre.gov>

To: <Jpappas@rag-american.com>

Date: 4/1/03 8:24AM

Subject: Castle Gate Holding Co. / OSM Recommendation

Hi Johnny / Susan:

See attached my recommendation letter for your OSM National Reclamation Award nomination. You did not receive a copy before hand.

Again, congratulations to all of you involved in this reclamation project.

Keep up the good work.

Best Wishes......Henry.

Henry Austin

Senior Reclamation Specialist USDI/OSM

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February 25, 2003

MEMORANDUM

To: 2003 Excellence in Surface Coal Mining Reclamation Awards Committee

Through: James F. Fulton, Chief, Denver Field Division

From: Henry Austin, Senior Reclamation Specialist

RE: 2003 AWARD NOMINATION FOR THE CASTLE GATE MINE, CASTLE GATE HOLDING CO., PERMIT NO.C/007/004, HELPER, UTAH

The Office of Surface Mining (OSM), Denver Field Division (DFD), respectfully recommends to the 2003 Awards Committee that the above award nomination submitted by the Utah Division of Oil, Gas and Mining (DOGM), for the Castle Gate Mine, Castle Gate Holding Company, be considered for the 2003 Excellence in Surface Coal Mining Reclamation Awards in the National Award category.

DFD has determined that an on site evaluation of the mine confirming that the nomination package information conforms with the permit, and accurately reflects current site conditions, was not warranted in this case as I have extensive oversight experience at this mine and have conducted several inspections here through the years including a Phase I bond release inspection which was concluded during 2001, and more recent mine evaluations to view revegetation success. There are no compliance issues at the site, nor other reclamation practices which detract from the nominated activities. DFD provides our strongest recommendation for a National Award based on our observations of the outstanding reclamation practices designed specifically for this site to ensure on-site effectiveness, and implemented at this mine at substantial and additional costs to the permittee.

Reclamation work was accomplished under extremely difficult site conditions including: pre-law disturbed areas replete with coal refuse fill materials, numerous highwalls, and cut slopes; steep backfilled outslopes; large undisturbed area runoff channels crossing final reclaimed slopes; and no topsoil salvage. This is also in a semi-arid / arid climate range making vegetation establishment challenging under the best of conditions.

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The permittee conducted reclamation enhancement activities on several areas of the site that had already been reclaimed and had received Phase I bond release. These enhancements have clearly improved reclamation success. Enhancements included improving major drainage channels, eliminating outslope erosion, and providing additional topsoil replacement in several areas. The permittee explored on site with backhoe pits to identify and select suitable topsoil replacement material. Four feet of suitable cover was used over coal refuse areas, and topsoil replacement depths averaged 22 inches throughout the reclaimed areas.

The permittee has enjoyed tremendous revegetation response as a result of the deep topsoil replacement (which was not required / only 6 inches was required) and deep gouging / roughening of the topsoil replacement which promotes moisture retention and vegetation success in this arid climate, and provides very effective sediment control during infrequent but heavy summer thunderstorms. Other reclamation operations in the Carbon County area have subsequently used this deep gouging practice with similar success. DFD feels these reclamation practices clearly exceed the spirit and intent of SMCRA at this pre-law site, and have resulted in a much more successful post mining land use.

Finally, the permittee has provided a valuable long-term benefit to the community by retaining a 75-foot section of Italian rock wall masonry. As stated in the nomination, the people of Carbon County are very proud of their mining heritage. This remnant of the past serves to remind present and future generations of the area's rich mining history and ethnic diversity resulting from over 100 years of coal mining and reclamation operations. This proud mining heritage and ethnic diversity continues, and this historic Italian rock wall remnant will enrich the community today and into the future.

DFD again fully recommends the Utah / DOGM nomination of the Castle Gate Mine be considered for a National Award, and further provides our strongest opinion that the reclamation practices and historic preservation represented in the nomination package exceed the spirit and intent of SMCRA particularly given the extensive pre-law disturbance at the site, and the difficulty of establishing vegetation in this arid climate. These reclamation practices proved to have tremendous on-site effectiveness, and provided a long-term historic preservation benefit for the community.